# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

THOMAS SIERRA,	
Plaintiff,	) Case No. 18 CV 3029
	Judge John Z. Lee
V.	) 
REYNALDO GUEVARA, et al.	) Magistrate Judge M. David Weisman
Defendants.	) ) ) HIRY TRIAL DEMANDED

# **PARTIES' JOINT STATUS REPORT**

Pursuant to the Court's Order (Dkt. 360), the parties in the above captioned matter submit the following joint status report:

# A. Retention of a Private Attorney For Alberto Rodriguez.

The parties have met and conferred on retaining a private attorney to represent Alberto Rodriguez in his deposition. The parties have agreed to jointly split the costs and fees associated with hiring and retaining a local attorney in the Arkansas/Tennessee area to represent Mr. Rodriguez while he is incarcerated in Forest City, Arkansas. The parties are currently in the process of compiling a list of mutually agreeable attorneys and will report back to the court upon finding an attorney who will agree to represent Mr. Rodriguez. The parties anticipate retaining an attorney for Mr. Rodriguez by April 11 and will work to reschedule the deposition thereafter.

Dated: March 28, 2022

Respectfully submitted,

/s/ Jeffrey R. Kivetz

JEFFREY R. KIVETZ

Special Assistant Corporation Counsel

One of the Attorneys for Individual Defendants

James G. Sotos Jeffrey R. Kivetz Josh M. Engquist David A. Brueggen Samantha J. Pallini

THE SOTOS LAW FIRM, P.C. 141 W. Jackson, Suite 1240A

Chicago, Illinois 60604

(630) 735-3300

jkivetz@jsotoslaw.com

Respectfully submitted,

/s/ Megan K. McGrath

MEGAN K. McGRATH

One of the Attorneys for Defendant Guevara

Thomas M. Leinenweber

James V. Daffada Megan K. McGrath Kevin E. Zibolski Michael J. Schalka

Leinenweber Barone & Daffada LLC

120 N. LaSalle St.

**Suite 2000** 

Chicago, IL 60602 (847) 251-4091 mkm@ilesq.com Respectfully submitted,

CELIA MEZA,

Corporation Counsel for City of Chicago

/s/ Eileen Rosen

EILEEN ROSEN

Special Assistant Corporation Counsel

One of the Attorneys for City of Chicago

Eileen E. Rosen Catherine M. Barber Theresa B. Carney Austin G. Rahe

Rock Fusco & Connelly, LLC 312 N. Clark, Suite 2200 Chicago, IL 60654 (312) 494-1000 erosen@rfclaw.com

Respectfully submitted,

/s/ Steven Art

STEVEN ART

One of the Attorneys for Plaintiff

Jon Loevy

Anand Swaminathan

Steven Art Rachel Brady Sean Starr Loevy & Loevy 311 N. Aberdeen St. Chicago, IL 60607 (312) 243-5900 steve@loevy.com

#### **CERTIFICATE OF SERVICE**

I, Jeffrey R. Kivetz, an attorney, certify that on **Monday, March 28, 2022,** I electronically filed the foregoing **Parties Joint Status Report** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants:

# Attorneys for Thomas Sierra:

Jon Loevy Steven Art Anand Swaminathan Joshua A. Tepfer Rachel Brady Sean Starr Imani Franklin Isabella Aguilar LOEVY & LOEVY 311 N. Aberdeen, 3rd Floor Chicago, IL 60607 (312) 243-5900 jon@loevy.com steve@loevy.com anand@loevy.com josh@loevy.com brady@loevy.com sean@loevy.com imani@loevy.com

aguilar@loevy.com

# Attorneys for City of Chicago:

Eileen E. Rosen Patrick R. Moran Stacy A. Benjamin Catherine M. Barber Theresa B. Carney Austin Gordon Rahe Rock Rusco & Connelly, LLC 312 N. Clark, Suite 2200 Chicago, IL 60654 (312) 494-1000 erosen@rfclaw.com pmoran@rfclaw.com sbenjamin@rfclaw.com cbarber@rfclaw.com tcarney@rfclaw.com arahe@rfclaw.com

# Attorneys for Defendants Guevara and Halverson:

James V. Daffada
Megan K. McGrath
Thomas M. Leinenweber
Kevin Edward Zibolski
Michael John Schalka
Leinenweber Baroni & Daffada, LLC
120 N. LaSalle St., Suite 2000
Chicago, IL 60602
(312) 663-3003
jim@ilesq.com
mkm@ilesq.com
thomas@ilesq.com
kevin@ilesq.com
mjs@ilesq.com

/s/ Jeffrey R. Kivetz
Jeffrey R. Kivetz